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Attorneys for Defendant
Comenity Bank

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KERRI THOMPSON,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES LLC;
NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; CLARITY
SERVICE, INC. AND COMENITY BANK,

Defendants.

CASE NO.: 2:25-cv-00359-CDS-EJY

**JOINT MOTION TO EXTEND TIME
FOR COMENITY BANK TO RESPOND
TO COMPLAINT**

[FIRST REQUEST]

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, Defendant Comenity Bank (“Comenity”) and Plaintiff Kerri Thompson (“Plaintiff”), by and through their respective counsel, request that the Court grant their Joint Unopposed Motion to Extend the Time for Comenity to answer or otherwise respond to Plaintiff’s Complaint. In support of this Motion, the parties stipulate as follows:

1. The Complaint was served on Comenity on February 27, 2025.
2. Comenity’s current deadline to respond to the Complaint is March 20, 2025.
3. The parties met and conferred about the extension of time to respond to the Complaint and agreed that Comenity’s deadline to respond to the Complaint shall be extended to April 21, 2025.

1 4. There have been no prior extensions of Comenity's deadline to respond to the
2 Complaint.

3 5. Accordingly, the parties respectfully and jointly request that the Court extend the
4 deadline for Comenity to answer or otherwise respond to the Complaint to April 21, 2025.

5
6 DATED: March 20, 2025

WOMBLE BOND DICKINSON (US) LLP
JOHN BRAGONJE

7
8 By: /s/ John Bragonje

9 John Bragonje
10 Attorneys for Defendant
Comenity Bank

11
12 DATED: March 20, 2025

FREEDOM LAW FIRM, LLC
GEORGE HAINES
GERARDO AVALOS

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15 By: /s/ Gerardo Avalos

16 Gerardo Avalos
17 Attorney for Plaintiff
Kerri Thompson

18 **ORDER**

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20 IT IS SO ORDERED.

21 
22 UNITED STATES MAGISTRATE JUDGE

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24 DATED: March 21, 2025